

STREAMLINING CUPA INSPECTIONS

EPIC+ SEMINAR, JULY 25TH 2018

Anastasiya Irkhin

Anastasiya.Irkhin@sdcounty.ca.gov

(858) 518-7388

Darren Thai

Darren.Thai@sdcounty.ca.gov

(858) 245-2567

OVERVIEW

What does a CUPA inspection look like?

Inspection walkthrough

Documentation Review

Helpful Tips

Contact Information

WHAT IS A CUPA?

Certified **U**nified **P**rogram **A**gency

- Hazardous Materials Business Plan (**HMBP**)
- California Accidental Release Program (**CalARP**)
- Hazardous Waste, Onsite Hazardous Waste Treatment
- Hazardous Materials Management and Inventory
- Aboveground Petroleum Storage Act (**APSA**)
- Underground Storage Tanks (**UST**)
- Medical Waste (San Diego County's Program)





WHAT DOES A CUPA INSPECTION LOOK LIKE?




```
graph TD; A[Introduction] --> B[Inspection walkthrough]; B --> C[Document review]; C --> D[Report writing/signing];
```

Introduction

Inspection walkthrough

Document review

Report writing/signing

INTRODUCTION

Your inspector will arrive unannounced, introduce themselves, and request consent for the inspection.



If consent to inspect is refused, the inspector will explain CUPA authority to inspect. If consent to inspect is not granted and the inspector has to return another day, a re-inspection fee (\$342) will be assessed.

INSPECTION WALKTHROUGH

- Please take the inspector to ALL lab areas, not just locations with hazardous/medical waste accumulation
- Areas inspected: Lab benches, Storage, Fume hoods, flammables cabinets, waste bins, under sinks, dumpsters
- Inspector may ask to talk to lab personnel during the walkthrough about their hazardous waste/material handling, disposal, training, etc.



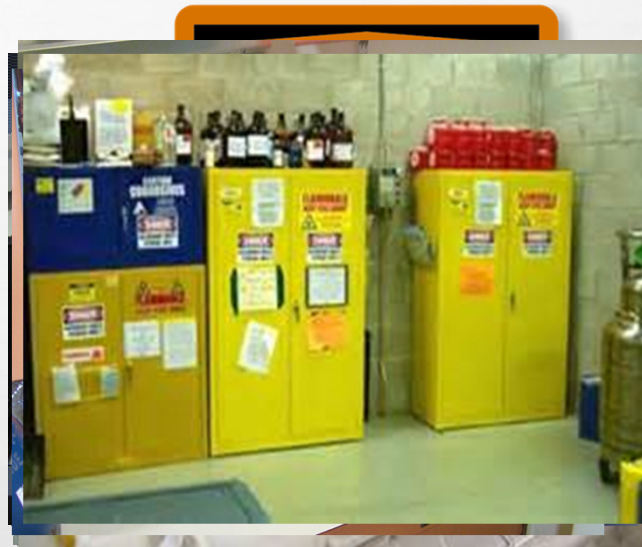
INSPECTION WALKTHROUGH

- Be sure to have keys to hazardous and medical waste storage areas and emergency generators if applicable.
 - If flammables cabinets and fume hoods are locked, ensure that you have access.
- It is ok to ask your inspector questions! Our goal is to educate as well as verify compliance.
- We will work with you to correct a minor violation discovered during the inspection.



THINGS WE LOOK FOR...

- Open containers, waste stored too long
- Unlabeled or inadequately labeled containers
- Overfilled containers
- Medical waste accumulation area signage/placarding and security
- Waste containers hooked up to machinery
- “Waste-like” materials
- “Lab pack” waste sorting area



DOCUMENTATION REVIEW

- It is helpful to have all documentation in one binder.
- Have a backup person who knows where this information is in case you are not present on inspection day.
- It may be helpful to send someone to prepare the documents for review during the walkthrough.
- Some documentation, such as training logs, might be kept with human resources. Be prepared to retrieve these documents.

Items to prepare:

- ☐ Hazardous Materials Business Plan
- ☐ Employees: the HMBP and hazardous waste training records
- ☐ Hazardous waste manifests, 3 years retention
- ☐ Land Disposal Restrictions (LDR)
- ☐ Waste determination documents
- ☐ Analytical reports of waste
- ☐ Biennial HW reports, if applicable
- ☐ Medical waste disposal records

REPORT WRITING/SIGNING

At the end of the inspection, the inspector will need to write and issue a inspection report.

The report will take some time to write. Feel free to attend to your other duties while we work.

Once we have finished, we will go over the report with you. Feel free to ask questions and make sure you understand the issues and follow-up.

Consultants are a resource!



However, the *facility* is responsible for demonstrating compliance with the law.

The facility staff should be familiar with the applicable law and regulations, and be able to cover the basics of an inspection.

HELPFUL RECOMMENDATIONS

Have your receptionist know who to contact when we arrive.

- The environmental contact is not always based on site.

Guide the inspector through your facility.

- Allow the inspector to check containers, processes, etc.

Be familiar with materials and waste streams.

- We don't expect full technical knowledge, but it is helpful if you can provide basic details about location of materials, frequency of waste generation, etc.

HELPFUL RECOMMENDATIONS



Organize hazardous waste disposal manifests by year/date.

- This helps the regulator determine generator status
- Helpful to include Land Disposal Restrictions with manifests

Provide 3 years of disposal records

- 2 years for medical waste if you are an LQG

Provide TSDF signed hazardous waste manifests for review

- TSDF manifests document that the waste made it to its final destination

CONTACT INFORMATION



Anastasiya Irkhin
Anastasiya.Irkhin@sdcounty.ca.gov
(858) 518-7388

Darren Thai
Darren.Thai@sdcounty.ca.gov
(858) 245-2567

We look forward to seeing you during your facility's next inspection!

Please feel free to contact your area inspector if you have any questions. Your inspector will vary depending on your facility's physical location. Contact the duty desk if you are unsure.

HMD Duty Desk
hmdutyeh@sdcounty.ca.gov
(858) 505-6880